

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Hon. Robert H. Cleland

-vs-

No. 16-20732

D-9 GASPER FIORE,

Sentencing Date: August 2, 2018

Defendant.

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**GOVERNMENT’S SENTENCING MEMORANDUM**

The United States of America submits the following memorandum in connection with the sentencing of defendant Gasper Fiore on August 2, 2018.

**I. Statutory Factors**

As the court is aware, Title 18, United States Code, Section 3553(a) requires the court to impose a sentence that is sufficient but not greater than necessary to comply with the purposes set forth in that section, based on the factors discussed below.

**A. The Nature and Circumstances of the Offense**

With not the slightest bit of convincing or cajoling needed, Fiore happily agreed to dole out stacks of \$100 bills to bribe then Clinton Township trustee Dean Reynolds, whom Fiore didn’t even know. Fiore was well aware that what he was doing was illegal. In fact, he refused to pay Reynolds directly, since he had just

been introduced by Chuck Rizzo. He told Rizzo that he only dealt directly with people in his inner circle in these matters. Fiore, a multi-millionaire, was willing to buy Dean Reynolds for \$7,000 and rob the residents of Clinton Township of their right to honest government, all for a few more bucks in towing profit.

**B. History and Characteristics of the Defendant**

Gaspar Fiore, while a self-made businessman, is also a prolific bribe payer dating back to at least the administration of Kwame Kilpatrick. Investigations by the FBI over the past two decades revealed that there was virtually no public official whose palms Fiore wouldn't try to grease if there was something in it for him or his businesses.

For example, in 2010, a high-level official with the Wayne County Sheriff's Department reported to the FBI that he learned that Fiore was paying deputies \$50 in cash for every towing referral. In 2011, an interview of a woman whose husband used to work for Fiore, described how Fiore used her husband to funnel straw campaign donations to Kwame Kilpatrick's campaign. Derrick Miller, the former Chief Administrative Officer under Kilpatrick and convicted bribe taker, told the FBI that Fiore got preferential treatment in City towing matters because he was a big financial supporter of Kilpatrick. Michael Tardif, a political advisor for Kilpatrick, reported to the FBI in 2008 that Fiore had previously directed Tardif to come to his towing company offices to retrieve cash in order to pay Kilpatrick's

election workers. Tardif went to Fiore's office and retrieved an envelope full of \$100 bills. Fiore even provided a car to then City Councilwoman Monica Conyers.

Despite seeing the former Mayor and his associates receive lengthy prison sentences for bribery, Fiore continued on, undeterred. In 2016, a wiretap of Fiore's telephone revealed that he was bribing Detroit Deputy Police Chief Celia Washington in exchange for her assistance with new towing rotations. When questioned by the FBI, Washington confessed to receiving \$4,000 in cash from Fiore. She also stated that Fiore attempted to bribe her a second time, but that she refused to accept the second envelope of cash. She also admitted that Fiore paid for drinks at her birthday party. A receipt from the purchase established that Fiore paid over \$600, just months before Washington's oversight of Fiore's towing rotations. Washington later pleaded guilty to a bribery conspiracy with Fiore and received a 12-month prison sentence from Judge Lawson.

Though not initially cooperative with the government, Fiore did later agree to cooperate. This is addressed fully in the government's under-seal filing regarding Fiore's cooperation.

**C. Seriousness of the Offense, Promoting Respect for the Law, Providing Just Punishment**

For over a decade, Gasper Fiore has been an enemy of honest government in Detroit. His offense here is yet another example of his trading cash for contracts and corrupting an otherwise fair process. His conduct is very serious, and he

deserves a punishment that addresses his embrace and continuation of pay-to-play politics.

**D. Providing Adequate Deterrence**

In light of what the City of Detroit endured under Mayor Kilpatrick, what is required here is a sentence that is sufficient to deter others who might, like Fiore, want to continue the pay-to-play way of life. A less-than-substantial sentence would send the wrong message to other businessmen and would-be Gasper Fiores.

**E. Protection of the Public from Further Crimes of the Defendant**

Given Fiore's propensity to pay bribes wherever it suits his interests, a significant prison sentence is needed to protect the public from further crimes by the defendant. This is because Fiore will likely continue to maximize his profits by any available means.

**F. Kinds of Sentences Contemplated by the Sentencing Guidelines**

The government concurs with the factual findings and guidelines calculations contained in the PSIR.

## II. Conclusion

Fiore bribed public officials in Metro Detroit for many years, persisting unfettered by the prison sentences of those around him whom he paid off. Given this, he has richly earned a sentence of 21 months imprisonment.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

s/R. MICHAEL BULLOTTA  
Assistant United States Attorney

s/DAVID A. GARDEY  
Assistant United States Attorney

Dated: July 19, 2018

### CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2018, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Robert M. Morgan  
*Attorney for Gasper Fiore*

s/R. MICHAEL BULLOTTA  
Assistant U. S. Attorney

Dated: July 19, 2018